

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

STATE OF LOUISIANA,  
By and through its Attorney General, LIZ  
MURRILL,

AMERICAN PETROLEUM INSTITUTE,  
and,

CHEVRON U.S.A. INC.,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES  
SERVICE, and

HOWARD LUTNICK, in his official capacity  
as the Secretary of Commerce,

Defendants.

CIVIL ACTION NO. 2:25-cv-00691-JDC-TPL

Hon. James D. Cain, Jr.

Magistrate Judge Thomas P. LeBlanc

**JOINT MOTION TO EXTEND THE DEADLINES SET OUT IN THE OCTOBER 8,  
2025, CASE MANAGEMENT ORDER AND REQUEST FOR ORAL ARGUMENT**

Plaintiffs the State of Louisiana, the American Petroleum Institute (“API”), and Chevron U.S.A. Inc. (“Chevron”) (collectively, “Plaintiffs”) and Federal Defendants National Marine Fisheries Service (“NMFS”) and Howard Lutnick (collectively, “Federal Defendants”) respectfully request that the Court enter the attached proposed order that (1) extends the current briefing schedule by an additional seven days and (2) grants the request to set a hearing date on the cross-motions for summary judgment on the first available date after January 19, 2026.

On October 7, 2025, Federal Defendants timely moved for a stay of further briefing deadlines in light of the lapse of appropriations affecting the United States and the Federal

agencies, including the Department of Justice, and requested that the briefing deadlines in this case be contingent on the effective date of the restoration of federal funding. Dkt. #39. The Court granted the unopposed motion on October 8, 2025. Dkt. #41.

On November 12, 2025, President Trump signed legislation restoring funding to the Department of Justice, which ended the 43-day lapse in appropriations. *See Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, H.R. 5371, 119th Congress (2025)*. As established in this Court's October 8, 2025, Order, the revised briefing schedule based on the effective date of the restoration of funding is as follows:

- Federal Defendants' reply in support of their cross-motion for summary judgment due December 10, 2025.
- Federal Defendants' response to Plaintiffs' motion to complete / supplement the record due December 3, 2025.
- Plaintiffs' reply in support of their motion to complete / supplement the record due December 10, 2025.

The Parties have met and conferred, and propose the following revised schedule that extends all briefing deadlines in this case by one week due to concerns about Federal Defendants' limited availability in December and conflicting case schedules:

- Federal Defendants' reply in support of their cross-motion for summary judgment due December 17, 2025.
- Federal Defendants' response to Plaintiffs' motion to complete / supplement the record due December 10, 2025.

- Plaintiffs' reply in support of their motion to complete / supplement the record due December 17, 2025.

In addition to the above, the Parties respectfully request that the Court hear oral argument on the cross-motions for summary judgment at the first available date after January 19, 2026, at the Court's convenience.

DATED: November 25, 2025,

Respectfully submitted,

/s/James A. Holmes

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